

# Food Allergen Notifications: A Guidance for Industry

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## Introduction

### Background

Millions of Americans have food allergies, and the numbers appear to be on the rise<sup>1</sup>. The increasing prevalence of food allergies presents a significant challenge for food establishments who manage allergen control alongside the countless other responsibilities associated with retail food service. During the 2018 biennial meeting of the Conference for Food Protection, an Allergens Committee was created with the charge to “develop methodologies for retail food establishments to notify consumers when menu items contain major food allergens, using research or evidence to support recommendations.” This guidance document was created in response to that charge.

### Purpose

To provide food establishment operators with current industry best practices for notifying consumers of major food allergens present in menu items and food that is unpackaged.

### Scope

This guidance document recommends best practices for informing consumers of major food allergen ingredients in menu items that are unpackaged (i.e., not covered by the Food Allergen Labeling and Consumer Protection Act or other labeling requirements). The recommendations outlined herein are supported by published peer-reviewed research, case studies, and survey results from operators and consumers. This guidance is intended for operators of retail food establishments, as defined in the US Food and Drug Administration (FDA) Food Code. For more detailed information, please refer to the appendix.

### Major Food Allergens

The FDA has identified the following foods that account for 90% or more of the documented food allergies in the United States<sup>2</sup>. Known as “major food allergens,” they are:

1. Milk
2. Egg
3. Soy
4. Wheat
5. Fish
6. Crustacean shellfish
7. Peanuts
8. Tree nuts

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<sup>1</sup> (Stallings & Oria, 2017)

<sup>2</sup> (US Food & Drug Administration, 2017)

## Guidance

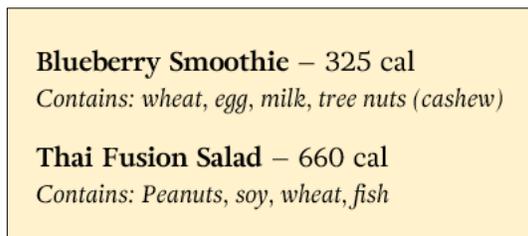
Consumers with food allergies depend on allergen information that is made available on labels and menus (or “notifications”) when making a purchasing decision. In a recent survey of 788 food-allergic consumers and family members, respondents overwhelmingly preferred a **combination of verbal and written allergen notifications** (Appendix B.1). Additionally, they indicated that notifications should be **specific** to menu items and the major food allergens they contain, rather than generic warnings that may apply to the entire menu or food preparation environment. Food allergen notifications should address all ingredients containing major food allergens, including “hidden ingredients,” such as egg washes, sauces, garnishes, etc.

In some cases, a food operation not be able to accommodate an allergen-free order. **Be open and honest** with the consumer about the limitations of the establishment in controlling food allergens.

## Written Notifications

Design menus (including those for online ordering, catering, and take-out) to ensure names and descriptions of food items fully represent the major food allergens they contain. For example:

1. Next to each menu item, include additional text to specify allergens (e.g., *Contains egg, milk*).
2. Use images (or “icons”) of food allergens next to menu items where they are present. Include a key so consumers know what the icons represent<sup>3</sup>. (See Appendix A for icon sets available for commercial use.)
3. Keep a clear and thorough allergen menu available to customers that provides *all* the ingredients for each menu item. This is particularly helpful for customers who are allergic to foods not listed as major food allergens by the FDA.



Example in-menu notification



Example allergen icons

## Verbal Notifications

When allergen information is provided verbally (by servers, managers, etc.), ensure the information is **accurate, verifiable, and consistent**. Food-allergic customers pay close attention to the way food workers respond to their questions and make purchasing decisions based on their perceptions. Food workers who appear uninformed or disinterested can negatively impact a customer’s confidence that their meal will be prepared safely<sup>4</sup>.

<sup>3</sup> (Marra, et al., 2017)

<sup>4</sup> (Begen, et al., 2016)

To provide a safe and enjoyable dining experience, operators are encouraged to implement the following practices:

- Provide a list of menu items and their ingredients for food workers to study so they are well-prepared at the point of sale. Keep the information somewhere it can be easily accessed and used frequently.
- Conduct training for front-of-the-house and back-of-the-house employees on major food allergens and cross-contact prevention. Training is essential to preventing unintended food allergen exposure.
- Appoint at least one team member or manager per shift to respond to customer requests and questions about food allergens. That team member may be a manager or person in charge<sup>5</sup>.

### Additional Notifications

Many food establishments provide information regarding major food allergens in places other than menu (Appendix B.2). These notifications can be very effective when the information provided is specific and assists consumers in making informed decisions.

Depending on the specific food operation, menu, and workflow, an operator may consider using these additional methods for informing consumers about the presence of major food allergens in menu items:

- For operations that emphasize major allergens as key menu items (e.g., bakery or seafood restaurant), add a notification in a highly visible area, such as **on or near the entrance**, informing consumers of the prevalence of that specific allergen.
- When contact with a major food allergen is unavoidable (e.g., french fries prepared in the same fryer as breaded [wheat-containing] items), use **counter cards, table-talkers or signs at the point of sale** to inform consumers.
- **Static clings** on display cases provide major food allergen information in customer view. **Tags or tents** next to food items also work well.

### Conclusion

When food-allergic customers feel confident and well-informed about their food choices, they are more willing to purchase—and they often bring friends and family along! Food operators who employ any combination of practices described in this document are making a business decision that will positively impact public health while simultaneously growing their customer base.

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<sup>5</sup> (Radke, et al., 2016)

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## APPENDIX

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### A) Food Allergens Icons

Recommendations from this guidance include the use of food allergen icons. While there is currently no uniform set of icons to represent the major food allergens identified by the FDA, there are several vector sets available for download online. The following options are available for commercial use.

1. [International Association for Food Protection \(IAFP\) Food Allergen Icons](#)
2. [StateFoodSafety Allergen Icons](#)
3. [Erudus Food Allergy Icons](#)

### B) Allergens Committee Notification Workgroup Surveys

In preparation for the development of this guidance document, the Notification Workgroup of the CFP Allergens Committee conducted two surveys: one to be completed by operators of licensed food establishments (“Industry Survey”) and the second to be completed by food-allergic consumers and their family members and/or caregivers (“Consumer Survey”). These surveys were conducted during April and May 2019 by food operators and consumers in the United States.

#### 1. Consumer Survey

##### Consumer Survey Overview

In May 2019, the Allergens Notification Workgroup created a survey to solicit the opinions of food-allergic consumers and their family members and caregivers. The survey was distributed to CFP members and to email directory recipients of Food Allergy Research and Education (FARE) and Food Allergy and Anaphylaxis Connection Team (FAACT). The survey garnered 788 responses from individuals across 49 US states.

##### Consumer Survey Summary of Responses

- More than 90% of respondents are dealing with food allergies or intolerances.
- The majority of respondents prefer:
  - A combination of written and verbal notifications regarding major food allergens;
  - Menus with major food allergen ingredients listed.
- A significant number of respondents requested cross-contact prevention information to be provided by food establishments claiming to be able to accommodate an allergen-free request.
- There was a consensus among respondents for:
  - Easy-to-recognize major food allergen icons;
  - Major food allergens to be listed directly near menu items rather than in a separate grid of all menu items.

## 2. Industry Survey

### Industry Survey Overview

A survey was sent out to industry regarding allergen notification in order to assess the following: current methods utilized to notify consumers of allergens present in unpackaged food; challenges associated with allergen notification; and to determine if there is a general consensus to provide a standard method for allergen notification across the food service industry.

The survey was distributed to the CFP industry caucus members and Florida Restaurant and Lodging Association members. A total of 72 individuals/organizations responded to the survey. Responses were received from individuals in the grocery and restaurant sectors.

### Industry Survey Summary of Responses

- Of industry respondents, 77% provide written information regarding major food allergens to consumers. This information is provided through a variety of means (menus, pamphlets, table tents, websites, smartphone apps, posters, scale labels, etc.). Many of the respondents use more than one method to provide the information. Of the remaining 23% of the survey respondents, the majority provide verbal information when asked by a customer.
- Of those that provide written information, 13% utilize symbols to identify major food allergens.
- Among respondents, 88% share information verbally when a customer asks about allergens, whereas 12% reported that the server takes a proactive approach and asks the customer if they have a food allergy prior to placing an order.
- In an open-ended survey question, respondents identified several challenges to notifying consumers of major food allergens, including:
  - Employee Training
  - Limited space on labels to provide full details
  - Customer understanding of challenges and requirements
- The majority of the respondents agree that a standard method of allergen notification should be utilized by establishments that serve prepared food that is not pre-packaged.

## C) References

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- Radke, T. J., Brown, L. G., Hoover, E. R., Faw, B. V., Reimann, D., Wong, M. R., . . . Ripley, D. (2016). Food Allergy Knowledge and Attitudes of Restaurant Managers and Staff: An EHS-Net Study. *Journal of Food Protection*, Vol. 29, No. 9, 1588–1598.

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